

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW MEXICO**

**CHUBB UNDERWRITING AGENCIES  
LIMITED FOR AND ON BEHALF OF  
SYNDICATE 2488; ALLIANZ  
GLOBAL RISKS US  
INSURANCE COMPANY;  
AND XL SPECIALTY INSURANCE  
COMPANY,**

*Plaintiffs*

**VERSUS**

**THE INSURERS SUBSCRIBING TO  
AVIATION COMMERCIAL  
GENERAL LIABILITY POLICY  
NO. PL 003391673-13, BEING:  
NATIONAL UNION FIRE  
INSURANCE COMPANY OF  
PITTSBURGH, PA; COMMERCE  
AND INDUSTRY INSURANCE  
COMPANY; AND AIG  
AEROSPACE INSURANCE  
SERVICES, INC.,**

*Defendants*

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**DEFENDANT AIG AEROSPACE INSURANCE SERVICES, INC.'S  
NOTICE OF REMOVAL**

Defendant AIG Aerospace Insurance Services, Inc. files this Notice of Removal, and would respectfully show the Court as follows:

1. On August 25, 2017, Plaintiffs Chubb Underwriting Agencies Limited for and on Behalf of Syndicate 2488; Allianz Global Risks US Insurance Company; and XL Specialty Insurance Company (collectively "Plaintiffs") filed their original complaint ("Complaint") in the case styled *Chubb Underwriting Agencies Limited for and on Behalf of Syndicate 2488, et. al., v. National Union Fire Insurance Company of Pittsburgh PA, et. al.*, Cause Number D-101-CV-2017-02435, pending in the State of New Mexico, County of Santa Fe, First Judicial District. In the Complaint, Plaintiffs allege claims against defendants AIG Aerospace Insurance Services,

Inc. (“AIG Aerospace Insurance Services”), National Union Fire Insurance Company of Pittsburgh, PA (“National Union”), and Commerce and Industry Insurance Company (“Commerce”).

2. On October 5, 2017, the summons and Complaint were served on AIG Aerospace Insurance Services. A copy of the summons and Complaint are attached hereto as Exhibit A. Upon information and belief, National Union and Commerce have not been served.

3. According to the Complaint, Plaintiff Chubb Underwriting Agencies Limited for and on behalf of Syndicate 2488, is incorporated under the laws of England and Wales with its principal place of business in London, England. (Complaint at ¶ 22). Plaintiff Allianz Global Risks US Insurance Company is incorporated under the laws of the State of Illinois, with its principal place of business in the State of Illinois. (Complaint at ¶ 23). Plaintiff XL Specialty Insurance Company is incorporated under the laws of the State of Delaware, with its principal place of business in the State of Connecticut. (Complaint at ¶ 24).

4. The Complaint also alleges that Defendant AIG Aerospace Insurance Services is incorporated under the laws of the state of Georgia, with its principal place of business in Georgia. (Complaint at ¶ 25(c)). Defendant National Union is incorporated under the laws of the state of Pennsylvania, with its principal place of business in the state of New York. (Complaint at ¶ 25(a)). Defendant Commerce is incorporated under the laws of the state of New York, with its principal place of business in New York. (Complaint at ¶ 25(b)).

5. Accordingly, this Court has subject matter jurisdiction over this action because all Plaintiffs are of diverse citizenship from all defendants, thereby satisfying the requirements of 28 U.S.C. § 1332. In addition, the matter in controversy exceeds the sum or value of \$75,000, since

Plaintiffs request return of their alleged contribution to a settlement fund, which is a sum that exceeds \$75,000. 28 U.S.C. § 1332(a).

6. Because no other defendants have been served, their consent is not necessary to removal. 28 U.S.C. § 1446(b)(2)(A). Even if necessary, National Union and Commerce consent to removal.

7. Removal of this action is timely because it is being removed within 30 days of October 5, 2017, which is the date AIG Aerospace Insurance Services was served with the summons and Complaint. (Ex. A).

8. Attached to this notice are true and correct copies of the following documents, which comprise all process, pleadings and orders served upon AIG Aerospace Insurance Services:

Exhibit A: The 8/25/17 Complaint and attachments; and the 10/5/17 Summons against Defendant AIG Aerospace Insurance Services, Inc.

Exhibit B The Civil Cover Sheet is attached as Exhibit B.

9. AIG Aerospace Insurance Services hereby demands a jury trial.

November 3, 2017

Respectfully submitted,

/s/ Jeffry H. Ray

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/s/ Ross Cunningham

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**ATTORNEYS FOR DEFENDANT  
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INC.**